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May 19, 2021

SO ORDERED.

By E-Mail

The Honorable Robert W. Lehrburger
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007



Robert W. Lehrburger, USMJ
May 19, 2021

Re: *United States v. Seth Andrew*, 21 Mag. 4262

Dear Judge Lehrburger:

We represent Mr. Seth Andrew in the above-captioned case. We write to respectfully request a modification of the bail conditions imposed by the Court on April 27, 2021. *See* ECF No. 4. The government and Pretrial Services Officer Dominique Jackson do not oppose the proposed modification.

Under the terms of his release, Mr. Andrew must remain within the District of Vermont, where he currently resides, except for attorney visits and court appearances. Mr. Andrew, who has been fully compliant with the terms of his release, intends to relocate his family to a home in Rhode Island¹ and anticipates that such a move will require several trips between Vermont and Rhode Island over the course of a few weeks.

We therefore respectfully request that the Court modify Mr. Andrew's conditions of release to permit him to travel between Vermont and Rhode Island for the purpose of relocation, on pre-arranged dates to be determined with Officer Jackson. Further, we request that the terms of Mr. Andrew's release be modified so that, upon completion of the move on or about June 7, 2021, his travel would be restricted to the District of Rhode Island, except for travel to the Southern District of New York for attorney visits and court appearances.

We thank the Court for its consideration of this request.

Respectfully submitted,
KRIEGER KIM & LEWIN LLP

By: 

Edward Y. Kim

¹ The address of the home has been provided to Officer Jackson.

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cc: AUSA Ryan B. Finkel
Pretrial Services Officer Dominique Jackson